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*Attorneys for Plaintiffs/Counterdefendants*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEW ENGLAND LIFE INSURANCE  
COMPANY, METROPOLITAN LIFE  
INSURANCE COMPANY,

Plaintiffs,

vs.

JIMMY LEE, an individual, JOHN (a/k/a JACK)  
EWING, an individual, KARIN METCALF, an  
individual, WEALTH CONSULTING GROUP,  
LLC, THE WEALTH CONSULTING GROUP  
LLC, and KAIZEN CONSULTANTS, LLC,

Defendants.

Case No. 14 CV 01797(JCM)(NJK)

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFFS/  
COUNTERDEFENDANTS' DEADLINE  
TO RESPOND TO LEE PARTIES'  
COUNTERCLAIMS**

**(SECOND REQUEST)**

JIMMY LEE, an individual, WEALTH  
CONSULTING GROUP, LLC; THE WEALTH  
CONSULTING GROUP LLC; KAIZEN  
CONSULTANTS LLC,

Counterclaimants,

vs.

NEW ENGLAND LIFE INSURANCE  
COMPANY, METROPOLITAN LIFE  
INSURANCE COMPANY

Counterdefendants.

Plaintiffs/Counterdefendants New England Life Insurance Company (“NELICO”), and Metropolitan Life Insurance Company (“MetLife”); Defendants/Counterclaimants Jimmy Lee (“Lee”), Wealth Consulting Group, LLC (“WCG”), The Wealth Consulting Group LLC (“TWCG”), and Kaizen Consultants LLC (“Kaizen”) (collectively, the “Lee Parties”); Defendant/Counterclaimant John (a/k/a Jack) Ewing (“Ewing”); and Defendant/Counterclaimant Karin Metcalf (“Metcalf”), through their respective counsel, hereby submit this Stipulation to extend Plaintiffs/Counterdefendants’ deadline to file a response to the Lee Parties’ Counterclaims [Dk. #106]. The Parties hereto stipulate and agree as follows:

1. The Lee Parties filed their Counterclaims on May 26, 2016.
2. Plaintiffs/Counterdefendants’ initial deadline to respond to the Lee Parties’ Counterclaims was June 20, 2016.
3. On June 21, 2016, this Court granted the parties’ request to extend Plaintiffs/Counterdefendants’ deadline to respond to the Lee Parties’ Counterclaims by fourteen (14) days. *See* Stipulation and Order to Extend Plaintiffs/Counterdefendants’ Deadline to Respond to Lee Parties’ Counterclaims (First Request) [Dk. #108].
4. As set forth in the Stipulation and Order to Extend Plaintiffs/Counterdefendants’ Deadline to Respond to Lee Parties’ Counterclaims (First Request), Plaintiffs/Counterdefendants’ deadline to respond to the Lee Parties’ Counterclaims is currently July 5, 2016.

5. Local Rule II 6-1 provides that a “stipulation to extend time shall inform the Court of any previous extensions granted and state the reasons for the extension requested.”
6. The Parties stipulate that Plaintiffs/Counterdefendants’ deadline to file a response to the Lee Parties’ Counterclaims be extended fourteen (14) days, from July 5, 2016 to July 19, 2016.
7. This is the second stipulation for an extension of Plaintiffs/Counterdefendants’ deadline to file a response to the Lee Parties’ Counterclaims.
8. The parties seek this second extension because they are discussing the final terms to the draft settlement agreements.

DATED this 5th day of July, 2016.

PROSKAUER ROSE LLP

By: s/ Joseph C. O’Keefe

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*Attorneys for Plaintiffs/Counterdefendants*

*New England Life Insurance Company and*

*Metropolitan Life Insurance Company*

1 DATED this 5th day of July, 2016.

2 BAILEY ❖ KENNEDY

3 By: *s/ Joshua M. Dickey*

4 JOHN R. BAILEY

5 JOSHUA M. DICKEY

6 PAUL C. WILLIAMS

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9 Las Vegas, Nevada 89148

10 *Attorneys for Defendants/Counterclaimants*

11 *Jimmy Lee; Wealth Consulting Group, LLC;*

12 *The Wealth Consulting Group LLC; and*

13 *Kaizen Consultants LLC*

DATED this 5th day of July, 2016.

JAMES KWON, LLC

By: *s/ James W. Kwon*

JAMES W. KWON

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*Attorneys for Defendants/Counterclaimants*

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**IT IS SO ORDERED:**

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**UNITED STATES MAGISTRATE JUDGE**

**DATED:** \_\_\_\_\_

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 5th day of July 2016, I served a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND PLAINTIFFS/COUNTERDEFENDANTS' DEADLINE TO RESPOND TO LEE PARTIES' COUNTERCLAIMS** by ECF on all counsel of record.

DATED this 5th day of July, 2016.

PROSKAUER ROSE, LLP

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New England Life Insurance  
Company and Metropolitan  
Insurance Company*